

Pro Se 7 (Rev. 10/16) Complaint for Employment Discrimination

United States District Court
for the
NORTHERN DISTRICT OF ALABAMA

FILED

Plaintiff,

(Write your full name. No more than one plaintiff may be named in a pro se complaint)

ChaunteL LaShaun Robertson

v.

Walgreens Centralized
Services

2020 MAR -4 P 3:27

U.S. DISTRICT COURT
N.D. OF ALABAMACase No.: 3:20-cv-297-MHH
(to be filled in by the Clerk's Office)JURY TRIAL ☐ Yes ☐ NoDefendant(s),

(Write the full name of each defendant who is being sued. If the names of all defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION**I. The Parties to This Complaint****A. The Plaintiff**

Name

ChaunteL Robertson

Street Address

118 Frost Circle #108-X

City and County

Sheffield Colbert

State and Zip Code

Alabama 35660

Telephone Number

512-589-1373

E-mail Address (if known)

C.robertson825@gmail.com

☒ Check here to receive electronic notice through the e-mail listed above. By checking this box, the undersigned consents to electronic service and waives the right to personal service by first class mail pursuant to Federal Rule of Civil Procedure 5(b)(2), except with regard to service of a summons and complaint. The Notice of Electronic Filing will allow one free look at the document, and any attached PDF may be printed and saved.

3-3-20

Date

ChaunteL Robertson

Participant Signature

II. Basis for Jurisdiction**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Tabatha French
Job or Title (<i>if known</i>)	Manager, Employee Relations
Street Address	102 Wilmet rd MS#123M
City and County	Deerfield
State and Zip Code	Illinois 60015
Telephone Number	847-682-6986
E-mail Address (<i>if known</i>)	tabatha.french@walgreens.com

Defendant No. 2

Name	Veronica Williams
Job or Title (<i>if known</i>)	Human Resources, Centralized
Street Address	2225 South Price rd
City and County	Chandler, Maricopa
State and Zip Code	Arizona 85286
Telephone Number	480-395-8376
E-mail Address (<i>if known</i>)	veronica.williams@walgreens.com

Defendant No. 3

Name	Robin Wilson
Job or Title (<i>if known</i>)	Centralized Services Group Manager
Street Address	2225 South Price Rd
City and County	Chandler, Maricopa
State and Zip Code	Arizona, 85286
Telephone Number	480-650-8043
E-mail Address (<i>if known</i>)	robin.wilson@walgreens.com

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Victoria Hatch
 Centralized Services Group Spv
 2225 South Price Rd
 Chandler, Maricopa
 Arizona, 85286
 480-752-5607
 victoria.hatch@walgreens.com

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s)
 is:

Name

Street Address

City and County

State and Zip Code

Telephone Number

Walgreens Centralized Services
 2225 South Price Road
 Chandler, Maricopa
 Arizona, 85286

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):

- ☐ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

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- ☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Other federal law *(specify the federal law):*

Relevant state law *(specify, if known):*

Relevant city or county law *(specify, if known):*

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me
☒ Termination of my employment
☐ Failure to promote me
☐ Failure to accommodate my disability
☐ Unequal terms and conditions of my employment
☒ Retaliation
☐ Other acts *(specify):* _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s):

March 2nd, January 4th, January 31st
Feb 1st and Feb 7th

C. I believe that defendant(s) (check one):

- ☐ is/are still committing these acts against me
- ☐ is/are not still committing these acts against me

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

- ☐ race _____
- ☐ color _____
- ☐ gender/sex _____
- ☐ religion _____
- ☐ national origin _____
- ☐ age (year of birth) _____

(only when asserting a claim of age discrimination)

- ☒ disability or perceived disability (specify disability) _____

Heppner's Granulomatosis

E. The facts of my case are as follows. Attach additional pages if needed. I

was terminated on March 2nd due to non compliance of their EAP program. I let them know under ADA law an employer cannot force an employee into that program unless the employee has made a threat against the lives at the job, a threat against my life, or not performing job duties. I never made any threats and was performing my job duties.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

I was also told I was being terminated for falsifying documents when applying for a job while on disciplinary. I had not applied for my positions within the company since June, July, August, and September of last year. I stopped applying because I exposed management within the company was actively blocking me from getting another position. Corporate and higher management kept telling me there were no positions available at the Muscle Shoals location. There were positions available and they had hired multiple classes when I applied each time I got denied. I took it upon myself to create a fake resume and see if I would get a response. As the fake person I was offered 2 positions. One for ecomm work from home and a consumer work from home. They also was going to offer the fake person a pay raise. The person had experience. But each time I asked and pursued a raise I was denied but my counterparts were all given raises or people that were newly hired made more than I. I never accept-

ed a job as fake person.

IV. Exhaustion of Federal Administrative Remedies

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date): _____

7-22-2019

B. The Equal Employment Opportunity Commission (check one):

☐ has not issued a Notice of Right to Sue letter

☒ issued a Notice of Right to Sue letter, which I received on (date): _____

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

C. Only litigants alleging age discrimination must answer this question:

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☐ 60 days or more have elapsed

☐ less than 60 days have elapsed

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I would like my job back as it will be hard finding other work from home positions ~~available~~ for my disability. I would also like financial reimbursement from the company while I was on suspension and termination and reimbursement for phone services and the usage of their equipment and any car fees

VI. Certification and Closing

Under Rule 11 of the Federal Rules of Civil Procedure, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of Signing: 3-3-20

Signature of Plaintiff: Chauntel Robertson
Printed Name of Plaintiff: Chauntel Robertson

B. For Attorneys

Date of Signing: _____

Signature of Attorney: _____

Printed Name of Attorney: _____

Bar Number: _____

Name of Law Firm: _____

Street Address: _____

State and Zip Code: _____

Telephone Number: _____

E-mail Address: _____

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Chauntel L. Robertson**
118 Frost Circle #108X
Sheffield, AL 35660

From: **Birmingham District Office**
Ridge Park Place
1130 22nd Street
Birmingham, AL 35205

☐

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

420-2019-02964

RICHARD W. MUSGRAVE,
Investigator

(205) 212-2068**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☒

The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☐

Other (briefly state)

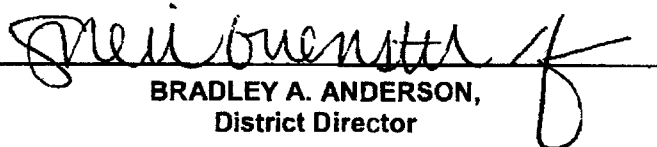
- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission


BRADLEY A. ANDERSON,
District Director

DEC - 4 2019

Enclosures(s)

(Date Mailed)

cc: **WALGREEN COMPANY**
c/o: Representative, Employment Law and Benefits
104 Wilmot Road, Ms#1456
Deerfield, IL 60015